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Acting Under Authority Conferred By 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	Case No. 18-CR-00258 EJD
	)	
Plaintiff,	)	DECLARATION OF SPECIAL AGENT
	)	ADELAIDA HERNANDEZ IN SUPPORT OF
v.	)	UNITED STATES' OPPOSITION TO
	)	DEFENDANT ELIZABETH HOLMES'S MOTION
ELIZABETH HOLMES and RAMESH	)	TO EXCLUDE EXPERT TESTIMONY OR, IN THE
"SUNNY" BALWANI,	)	ALTERNATIVE, COMPEL ADEQUATE RULE 16
	)	DISCLOSURE
Defendants.	)	

I, Adelaida Hernandez, declare:

1. I am a Special Agent with the Federal Bureau of Investigation.

2. During the interview of Dr. Gerald S. Asin, MD, on March 4, 2020, at his medical practice in Paradise Valley, Arizona, Dr. Asin stated that he only kept paper files. Dr. Asin added that he received less reimbursement from Medicare because he preferred to keep paper records and did not adopt digital records as Medicare had required. Because Dr. Asin used paper files, Dr. Asin used his

1 memory of patients to pull files and show relevant Theranos test results.

2 3. I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing is true and correct.

4 DATED: July 10, 2020

/s/

5 ADELAIDA HERNANDEZ  
6 Special Agent, FBI  
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